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4 Chapter 7 Trustee

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8 **UNITED STATES BANKRUPTCY COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

10 In re

Case No. 2:20-bk-21022-BR

11 GIRARDI KEESE,

Chapter 7

12 Debtor.

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14 **NOTICE OF CHAPTER 7 TRUSTEE'S
APPLICATION TO EMPLOY THE LAW
OFFICES OF RONALD RICHARDS &
ASSOCIATES, A.P.C., AS SPECIAL
LITIGATION COUNSEL**

15 [11 U.S.C. §§ 327(c) and (e), 328(a); Fed.
16 R. Bankr. P. 2014; Loc. Bankr. R. 2014-
1(b)]

17 [No Hearing Required]

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20 **TO THE HONORABLE BARRY RUSSELL, UNITES STATES BANKRUPTCY
21 JUDGE AND TO ALL PARTIES IN INTEREST:**

22 **PLEASE TAKE NOTICE** that Elissa D. Miller, Chapter 7 Trustee (the "Trustee"),
23 for the estate of the Debtor, Girardi Keese (the "Debtor") has filed an "*Application to
Employ the Law Offices of Ronald Richards & Associates, A.P.C., as Special Litigation
Counsel, Declaration of Ronald Richards; Statement of Disinterestedness of Ronald
Richards in Support Thereof*" (the "Application"), pursuant to which the Trustee seeks an
24 order of this Court authorizing the employment of the law firm of Ronald Richards &
25 Associates, A.P.C. ("Richards") to act as her special litigation counsel.
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1 **PLEASE TAKE FURTHER NOTICE** that the Trustee is retaining Richards as her
2 Special Litigation Counsel to assist with the investigation and undertake such
3 proceedings and/or actions as may be appropriate in connection with investigating and
4 recovering estate property and filing such proceedings and/or actions as are appropriate
5 in connection with transfers to Erika Girardi (aka Erica Jayne).

6 **PLEASE TAKE FURTHER NOTICE** that the Trustee proposes to retain Richards
7 on a contingency basis with the amount of compensation to be as follows: 35% of the net
8 recovery prior to commencement of litigation, 40% after the complaint is filed through 60
9 days prior to a jury or bench trial, and 45% thereafter. "Net recovery" means the amount
10 remaining after the total amount received (whether by settlement, arbitration award, or
11 court judgment) has been reduced by the sum of all "costs," as defined in the
12 Engagement Agreement. Richards also shall be entitled to reimbursement of its out of
13 pocket costs incurred during the course of the instant engagement as approved by the
14 Court, with such costs to be advanced by Richards and paid from the same source of
15 funds to be used for payment of the Firm's fees and in accordance with the terms of the
16 Engagement Agreement.

17 **PLEASE TAKE FURTHER NOTICE** that other than the contingency fee and costs
18 to be paid to Richards as set forth herein and in the Engagement Agreement, Richards
19 shall have no claims against the estate.

20 **PLEASE TAKE FURTHER NOTICE** that any party wishing to obtain a copy of the
21 Application may do so by contacting the Trustee in writing at the address or e-mail on the
22 upper left hand corner of this Notice.

23 **PLEASE TAKE FURTHER NOTICE** that if you do not oppose the Application, you
24 need not take any further action. However, any objection and request for hearing, in the
25 form required by Local Bankruptcy Rule 9013-1(f), must be filed with the Court and
26 served on the Trustee and the Office of the United States Trustee located at 915 Wilshire
27 Blvd., Suite 1850, Los Angeles, CA 90017, not later than 14 days, plus three days for
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1 service by mail or pursuant to F.R.Civ.P. 5(b)(2)(D) or (F), after the date of service of this
2 notice.

3 **PLEASE TAKE FURTHER NOTICE** that failure to timely file and serve such
4 response and request for hearing may result in any response being deemed waived and
5 the Court entering an order approving the Application without hearing a pursuant to Local
6 Bankruptcy Rules 2014-1 and 9013-1.

7 | DATED: April 26, 2021 Respectfully submitted,

Respectfully submitted,

9 By: /s/ Elissa D. Miller
Chapter 7 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 333 South Grand Avenue, Suite 3400, Los Angeles, CA 90071.

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF CHAPTER 7 TRUSTEE'S APPLICATION TO EMPLOY THE LAW OFFICES OF RONALD RICHARDS & ASSOCIATES, A.P.C., AS SPECIAL LITIGATION COUNSEL** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) April 26, 2021, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (date) April 26, 2021, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor
Girardi Keese
1126 Wilshire Blvd
Los Angeles, CA 90017-1904

Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 26, 2021
Date

Cheryl Caldwell
Printed Name

/s/Cheryl Caldwell
Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

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